

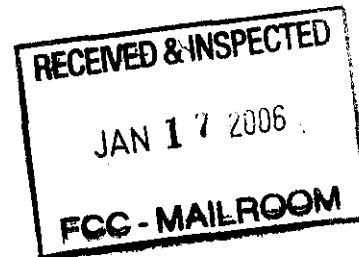


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January 13, 2006



Ms. Marlene Dortch, Secretary  
Federal Communications Commission  
445 12<sup>th</sup> Street, S.W.  
Washington, D. C. 20554

Re: Reply Comments of Telcordia Technologies, Inc. in CC Docket No. 99-200,  
in response to Public Notice #DA 05-3102, released Nov. 29, 2005

Dear Ms. Dortch,

Enclosed please find an original and four copies of Reply comments of Telcordia Technologies, Inc. ("Telcordia") for filing in the above-referenced proceeding. These comments have also been filed electronically, using the FCC Electronic Comment Filing System (confirmation number **2006113294903**).

Sincerely,

Michael S. Slomin  
Senior Counsel

Enclosures

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Before the  
Federal Communications Commission  
Washington, D.C. 20554

In the Matter of	)	CC Docket No. 99-200
	)	
Numbering Resource Optimization	)	
	)	

**REPLY COMMENTS OF TELCORDIA TECHNOLOGIES, INC ON THE  
THOUSANDS-BLOCK POOLING ADMINISTRATOR  
TECHNICAL REQUIREMENTS**

Telcordia Technologies, Inc. ("Telcordia") welcomes the opportunity to submit reply comments on the Thousands-Block Pooling Administrator Technical Requirements document, on which the Commission has invited comment.<sup>1</sup>

**Benefits of Competitive Bidding Must Not Be Sacrificed**

In its Comments, Telcordia identified two factors that, unless addressed, will improperly disadvantage bidders other than the incumbent: (1) information on the incumbent's current systems must be provided to other bidders so that all bidders can bid on the same basis, and (2) ambiguities in the technical requirements need to be resolved, so that all bidders, and not only the incumbent, will interpret them as desired by the industry and the Commission. We note that another non-incumbent vendor, Syniverse, makes similar points. Unless these matters are addressed, the bidding process will be fundamentally flawed, and the Commission and the public will be deprived of the benefits of full and fair competitive bidding.

**Comments on Technical Issues**

The other vendors submitting comments, Syniverse and the incumbent, NeuStar, largely concurred with Telcordia's detailed comments. Where Telcordia suggested changes or sought clarification to specific requirements, these vendors either agreed with Telcordia's comments or

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<sup>1</sup> Public Notice #DA 05-3102, released November 29, 2005 and Erratum released December 5, 2005.

did not address the same matter. Importantly, NeuStar states that it too expected that the FCC would allow for the current system, developed by NeuStar, to be enhanced by the new pooling administrator rather than replaced. Telcordia believes that the merits of a new system can be an important differentiating factor in determining the winner of competitive bidding, and should therefore be permitted. However, we acknowledge that due to the similarity between the original Pooling Administrator requirements and the current requirements, enhancement of the current system may be a viable option – provided that bidders other than the incumbent have equal access to the current system and its capabilities. As noted in our comments, in this regard, all potential bidders need to be provided access to the system code, documentation and subject matter experts, as well as any evaluation of the current system’s compliance with the initial technical requirements and any identification of shortfalls.

Syniverse urges that a workflow engine should be required and that fax submission should not be supported, or if supported, automated support of the fax submissions should be required<sup>2</sup>. Telcordia notes here that both GUI and automated Electronic File Transfer (EFT) interfaces are supported in the current Pooling Administration System (PAS) and continue to be required in the new requirements, and that the current PAS, according to the available user guides<sup>3</sup>, has some workflow engine functionality. Telcordia also notes that fax submissions of Part 1A forms are generally the exception. Part 1 CO Code Forms may be faxed for forwarding to NANPA, but the new requirements already overcome this by requiring that an automated interface between PAS and NAS. Telcordia recommends that the requirement in 2.16 and similar requirements elsewhere do not need to be modified as suggested by Syniverse. Such changes are not needed because the current system and the technical requirements already have

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<sup>2</sup> Comments of Syniverse Technologies, 3.

<sup>3</sup> PAS User Guide For Service Providers, [www.nationalpooling.com](http://www.nationalpooling.com). Telcordia anticipates that there is similar documentation for Pooling Administrators and system administrators. All such documentation should be made available to bidders should enhancements be permitted or required.

the necessary aspects of workflow management embedded within them. In addition, while fax submissions should still be permitted as an exception (as they are today), the FCC could allow for development of automated fax processing if the bidder finds it beneficial. The FCC should provide in or with the technical requirements an outline of how many applications are submitted via the GUI, EFT and Fax/e-mail, to enable bidders to perform an analysis. Furthermore, if enhancements to the current system are to be permitted, all potential bidders will need to be provided sufficient information and time to understand the workflow engine capabilities, as well as other features, functions and capabilities, of the current system, so that they can assess the need for enhancements to the current system.

Syniverse raises concerns similar to Telcordia at Section 2.37, and Telcordia supports a solution that provides the contractor with flexibility to staff the pooling organization in a way that meets the FCC's and the industry requirements for neutral number administration.

Syniverse suggests an additional requirement for a flexible reporting engine and for user logon administration<sup>4</sup>. Such a requirement is certainly achievable, but if the FCC or the industry required such a mechanism, it is capable of specifying such a requirement. If the users of PAS in reply comments support such a requirement, it could be added. If not, vendors should be given the leeway to propose additional features above the scope of the requirements as part of their proposals.

Syniverse also suggests updating the interface between the Number Portability Administration Center (NPAC) and the PA<sup>5</sup>. Telcordia agrees that there may be benefits associated with a more direct interface between the PA and NPAC; however, the industry could have added such a requirement had it desired to do so. Telcordia is concerned that any such requirement, if not very carefully drawn, may provide the incumbent wholly unwarranted

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<sup>4</sup> Comments of Syniverse Technologies, 10-11.

advantages over other bidders. For Pooled Block applications, SPs already have the option for activating their block via their Service Order Activation (SOA) system (or clearing house service) rather than via the Part 1B e-mailed from the PA to the NPAC.

If a direct PA-NPAC access requirement is carefully drawn so as not to undermine competitive bidding, it might provide benefits. One potential benefit of direct NPAC access for the PA is that this might provide means for addressing an issue that has arisen in the NANC LNPA Working Group,<sup>6</sup> the PA might use the access, even the Low Tech Interface GUI access, to check that IntraService Provider Ports have been performed on contaminated blocks before a block is assigned. A second potential benefit of direct NPAC access for the PA is that this might enable the PA to determine if there are ported numbers (or pending port requests) within a returned or abandoned thousands-block. Presently the PA has to request that the NANPA obtain an ad-hoc NPAC report in order to perform this check. However, these changes would require additional changes to the INC guidelines and possibly at the NPAC to implement and would likely require other changes to the pooling technical requirements, and they should be considered by the consensus process of the industry via the appropriate industry forums. In sum, if the industry supports more direct interface between the PA and the NPAC, Telcordia would not object as long as the INC Guidelines, the NPAC Methods & Procedures and the Pooling Technical Requirements were clear.

NeuStar, like Telcordia, notes that the change in the technical requirements to the forecasting section would limit the PA's ability to provide a 6-month rate area inventory of pooled numbers<sup>7</sup>. Telcordia concurs with NeuStar's views and reiterates its detailed comments on this matter in its Comments.

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<sup>5</sup> Comments of Syniverse Technologies, 4.

<sup>6</sup> NANC LNPA WG PIM 24.

<sup>7</sup> Comments of NeuStar, Inc., 3-5.

In conclusion, Telcordia again emphasizes the importance of ensuring a level playing field for all vendors – incumbent and non-incumbent – to promote the public's interest in achieving the benefits of competitive bidding and for consistency with the provisions and policies of the Competition in Contracting Act. Telcordia supports changes to the technical requirements that provide potential vendors the ability to provide more accurate and focused responses to the anticipated solicitation, without providing the incumbent improper advantages over others.

Respectfully submitted,

TELCORDIA TECHNOLOGIES, INC.

By its attorney:

  
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January 13, 2006

CERTIFICATE OF SERVICE

I, Michael S. Slomin, hereby certify that a copy of Telcordia's Reply Comments in CC Docket No. 99-200 in response to Public Notice DA 05-3102 were filed electronically with the Federal Communications Commission. A copy of the foregoing filing was mailed first class mail, postage prepaid, to each of the following parties who filed Comments in response to that Public Notice:

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Syniverse Technologies  
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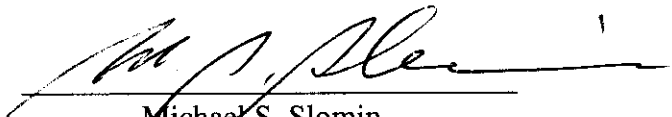
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January 13, 2006